Applied Hydrology Associates, Inc.

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May 9, 1991

Mr. Bernard J. Schorle
Remedial Projects Manager
U.S. EPA Region 5
Office of Superfund (5HS-11)
230 S. Dearborn Street
Chicago, IL 60604

RE: Acme Solvents Site PRPs Comments on the Proposed Plan for the Pagel's Pit Superfund Site Winnebago County, Illinois

Dear Mr. Schorle:

Applied Hydrology Associates, Inc. (AHA) is employed by the Acme Solvents PRP Steering Committee as the Technical Manager for the remedial design and remedial action at the Acme Solvents Reclaiming, Inc. Superfund site (Acme site). AHA along with the Acme PRPs has reviewed the "Proposed Plan for the Pagel's Pit Superfund Site Winnebago County, Illinois April, 1991," and would ask that you consider the following comments on the proposed plan.

1. The Proposed Plan contains no indication that the ground water in the St. Peter Sandstone was sampled and analyzed. Without sampling and analysis of the St. Peter Sandstone it may not be possible to accurately characterize the potential for vertical migration of materials from the Pagel's Pit site. We do not understand how it is possible to adequately "...characterize the nature and estimate the magnitude of potential risks to public health and the environment." from the Pagel's Pit site without information on the potential for vertical migration of materials from the Pagel's Pit site.

2. The alternatives that are presented as having been evaluated under the "Summary of Alternatives" do not seem to address the full range of remedial alternatives that are required by the National Contingency Plan. Specifically, there does not appear to have been any evaluation of an alternative that addresses restoration of any affected ground water resources not immediately adjacent to the Pagel's Pit site. The lack of an evaluation of an aquifer restoration alternative seems unusual in light of the evidence presented that materials have migrated from the Pagel's Pit site and the potential future use of ground water as a water supply is presented as a primary consideration in the baseline risk assessment.

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3. The elevated levels of conductivity and alkalinity that were reportedly found in the wells "...nominally upgradient and sidegradient from the landfill" could be an indication that the development of the landfill may have altered the local hydrologic regime with the landfill acting as a ground water recharge mound for the shallow aquifer. This is not an uncommon situation around municipal solid waste landfills. Such a condition might easily lead to the contamination identified in the southeast corner of the Pagel's Pit site. However, the statement that "[a] connection has not been established between the contamination on and near the Acme Solvents site and the contamination in the southeast corner of the Pagel's Pit site" could cause a reviewer to believe that there is reason to suspect a more significant connection between the Acme Solvents site and the southeast corner of the Pagel's Pit site than any data seems to support. The Acme Solvents PRPs do not believe such a connection exists and should not be implied.

4. The ground water control system described in the Proposed Plan seems to only address affected ground water in the unconsolidated deposits near the western boundary of the site. We are interested in how EPA plans to control any other affected ground water from the Pagel's Pit site, specifically the ground water that may be in the unconsolidated deposits beneath the site but not along the western boundary of the site and the fractured bedrock below the eastern quarter of the site.

5. It may be incorrect to assume that the only source of leachate from the landfill is infiltration of precipitation through the landfill contents. Decomposition of the landfilled materials, in situ moisture content of the landfilled materials and precipitation that falls on the landfill contents during placement will all contribute to leachate formation. As a result it will be necessary to maintain and operate the leachate extraction system until leachate is no longer generated rather than until infiltration is controlled as stated in the Proposed Plan.

The Acme Solvents PRPs will be looking forward to receipt of the Responsiveness Summary to review EPA's response to these and the other comments received during the comment period. Also, please accept this comment letter as a request to be placed on the mailing list to receive any future information regarding the Pagel's Pit site. If you have any questions or require any additional information, please do not hesitate to call.

Sincerely,

Ben Costello
Technical Manager
Acme Solvents PRPs

pc: Acme Solvents PRP Steering Committee
MaryAnn LaFaire, Community Relations Coordinator, U.S. EPA Region 5

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